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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ETHAN ZUCKERMAN,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:24-CV-02596-JSC

**DECLARATION OF KRISTIN A.
LINSLEY IN SUPPORT OF JOINT
STIPULATION REGARDING
AMENDED COMPLAINT AND CASE
SCHEDULE**

Judge: Hon. Jacqueline Scott Corley
Courtroom: 8, 19th floor

I, Kristin A. Linsley, hereby state and declare as follows:

1. I am an attorney licensed to practice in the courts of the State of California as well as the United States District Court for the Northern District of California. I am a partner with the law firm of Gibson, Dunn & Crutcher LLP, and am the lead attorney representing Defendant Meta Platforms, Inc. in this action. I submit this declaration pursuant to Civil Local Rule 6-2(a). I have personal knowledge of the matters stated herein, and if asked to testify thereto, I would do so competently.

2. Plaintiff filed the complaint against Defendant on May 1, 2024. Defendant was served with the complaint on May 2, 2024.

3. On May 23, 2024, the Parties filed a stipulation pursuant to Civil Local Rule 6-1(a) extending to June 20, 2024 Defendant's deadline to answer or otherwise respond to Plaintiff's complaint (Dkt. 25).

4. On May 21, 2024, Plaintiff's counsel advised Defendant's counsel that Plaintiff intends to file an amended complaint.

5. The Parties have conferred regarding Plaintiff's plan to file an amended complaint and Defendant's response thereto, including a briefing schedule for a motion to dismiss (should Defendant respond to the amended complaint with a motion to dismiss). The Parties have agreed, subject to the Court's approval, to the following schedule:

Deadline	Date
Plaintiff to file amended complaint	May 31, 2024
Defendant to answer or otherwise respond to amended complaint	July 15, 2024
Motion(s) for leave to file amicus brief in support of motion to dismiss*	July 22, 2024
Plaintiff to file opposition to motion to dismiss*	August 29, 2024
Motion(s) for leave to file amicus brief in support of Plaintiff's opposition to motion to dismiss*	September 5, 2024
Defendant to file reply in support of motion to dismiss*	September 23, 2024
* <i>Applicable if Defendant responds to the amended complaint with a motion to dismiss</i>	

6. The Parties further agree that, subject to the Court's approval, the initial case management conference currently scheduled for August 1, 2024 at 1:30 p.m. and remaining deadlines in the Initial Case Management Order (other than the deadlines for filing certifications of conflicts and interested entities or persons, which the Parties have already satisfied), should be vacated pending Plaintiff's forthcoming amended complaint and Defendant's response thereto. The Parties further agree to file a joint status report within two weeks after the filing of an answer to the amended complaint or, if a motion to dismiss is filed, within two weeks after resolution of the motion to dismiss.

7. The Parties believe the proposed schedule would be in the interests of judicial efficiency by ensuring sufficient time for the Parties to brief the legal and factual issues for the Court. The proposed schedule also accommodates counsel's existing conflicts and preplanned travel. The Parties also believe the proposed schedule would be in the interests of judicial efficiency by ensuring that the Parties' ADR certifications, conferral pursuant to Federal Rule of Civil Procedure 26(f), and positions on further case management would be informed by Defendant's response to the amended complaint and/or resolution of any motion to dismiss.

8. Aside from the stipulation pursuant to Civil Local Rule 6-1(a) referenced in paragraph 3 above, there have been no other time modifications in the case.

9. Aside from the existing events and deadlines referenced herein, if granted, the parties' stipulation would not affect any other event or deadline already fixed by Court order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29th day of May, 2024, at Kensington, California.

/s/ Kristin A. Linsley
Kristin A. Linsley